



## Service of Process Transmittal Summary

**TO:** Brandon Kosinski  
UBER TECHNOLOGIES, INC.  
950 23RD ST  
SAN FRANCISCO, CA 94107-3401

**RE:** Process Served in California

**FOR:** UBER TECHNOLOGIES, INC. (Domestic State: DE)

### ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

**TITLE OF ACTION:** Re: ALEJANDRA C. PEREZ VASQUEZ // To: UBER TECHNOLOGIES, INC.

**DOCUMENT(S) SERVED:** Notice, Summons, Verified Complaint, Verification, Attachment

**COURT/AGENCY:** New York County Supreme Court, NY  
Case # 8066882022E

**NATURE OF ACTION:** Personal Injury - Vehicle Collision - 07/27/2019

**PROCESS SERVED ON:** C T Corporation System, GLENDALE, CA

**DATE/METHOD OF SERVICE:** By Process Server on 05/05/2022 at 01:36

**JURISDICTION SERVED:** California

**APPEARANCE OR ANSWER DUE:** Within 20 days after the service of this summons, exclusive of the day of service  
(Document(s) may contain additional answer dates)

**ATTORNEY(S)/SENDER(S):** Joseph G. Dell  
DELL & DEAN, PLLC  
1225 Franklin Avenue, Suite 450  
Garden City, NY 11530  
516-880-9700

**ACTION ITEMS:** CT has retained the current log, Retain Date: 05/05/2022, Expected Purge Date:  
05/10/2022

Image SOP

Email Notification, Claims Lit intake@uber.com

Email Notification, Sara Hernandez shernandez@uber.com

Email Notification, Brandon Kosinski bkosinski@uber.com

**REGISTERED AGENT CONTACT:** C T Corporation System  
330 N BRAND BLVD  
STE 700  
GLENDALE, CA 91203  
877-564-7529  
MajorAccountTeam2@wolterskluwer.com



**CT Corporation**  
**Service of Process Notification**

05/05/2022

CT Log Number 541527194

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



PROCESS SERVER DELIVERY DETAILS

Date: Thu, May 5, 2022  
Server Name: David L.

Entity Served	UBER TECHNOLOGIES, INC.
Case Number	806688/2022E
Jurisdiction	CA

Inserts		



**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF**

-----X

Plaintiff/Petitioner,  
- against -

Index No.

Defendant/Respondent.

-----X

**NOTICE OF ELECTRONIC FILING  
(Consensual Case)  
(Uniform Rule § 202.5-b)**

**You have received this Notice because:**

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

● **If you are represented by an attorney:**

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

● **If you are not represented by an attorney:**

**You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.**

**If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.**

**The benefits of participating in e-filing include:**

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

**To register for e-filing or for more information about how e-filing works:**

- visit: <http://www.nycourts.gov/efile-unrepresented> or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at [www.nycourts.gov](http://www.nycourts.gov)

To find legal information to help you represent yourself visit [www.nycourthelp.gov](http://www.nycourthelp.gov)

### Information for Attorneys

An attorney representing a party who is served with this notice must either consent or decline consent to electronic filing and service through NYSCEF for this case.

Attorneys registered with NYSCEF may record their consent electronically in the manner provided at the NYSCEF site. Attorneys not registered with NYSCEF but intending to participate in e-filing must first create a NYSCEF account and obtain a user ID and password prior to recording their consent by going to [www.nycourts.gov/efile](http://www.nycourts.gov/efile)

Attorneys declining to consent must file with the court and serve on all parties of record a declination of consent.

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at [www.nycourts.gov/efile](http://www.nycourts.gov/efile) or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: [nyscef@nycourts.gov](mailto:nyscef@nycourts.gov)).

Dated: \_\_\_\_\_

Name

Address

Firm Name

Phone

\_\_\_\_\_  
E-Mail

To: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

6/6/18

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

Index No.:

Date Purchased:

**SUMMONS**

-----X  
ALEJANDRA C. PEREZ VASQUEZ,

Plaintiff,

Plaintiff designates Bronx  
County as the place of trial.

-against-

The basis of venue is:  
Defendant Eugene H.  
Hasiwar's residence

EUGENE H. HASIWAR, CHRISTOPHER J. MADDY,  
ERIC A. CLARK, JONAS G. ESTRELLA-REYNOSO and  
(UBER TECHNOLOGIES, INC.,

Defendants.

County of BRONX

-----X

**To the abovenamed Defendants:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Garden City, NY  
May 2, 2022

DELL & DEAN, PLLC  
Attorneys for Plaintiff  
ALEJANDRA C. PEREZ VASQUEZ

By: \_\_\_\_\_

JOSEPH G. DELL

1225 Franklin Avenue, Suite 450  
Garden City, New York 11530  
(516) 880-9700  
File No. 4658

TO: EUGENE H. HASIWAR  
239 West 254<sup>th</sup> Street  
Bronx, New York 10471

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 05/02/2022

CHRISTOPHER J. MADDY  
1636 W. 15<sup>th</sup> Street  
Anderson, Indiana 46016

ERIC A. CLARK  
2500 S. Broadway Street  
Yorktown, Indiana 47396

JONAS G. ESTRELLA-REYNOSO  
49 Thorne Street, Apt. 3C  
Jersey City, New York 07307

UBER TECHNOLOGIES, INC.  
1455 Market Street, 4<sup>th</sup> Floor  
San Francisco, CA 94103

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
ALEJANDRA C. PEREZ VASQUEZ,

Plaintiffs,

**VERIFIED COMPLAINT**

-against-

Index No.:

EUGENE H. HASIWAR, CHRISTOPHER J. MADDY,  
ERIC A. CLARK, JONAS G. ESTRELLA-REYNOSO and  
UBER TECHNOLOGIES, INC.,

Defendants.

-----X

Plaintiff, by her attorneys, **DELL & DEAN, PLLC**, complaining of the Defendants, respectfully alleges, upon information and belief, as follows:

1. At all times herein mentioned, Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** was, and still is, a resident of the State of Florida.
2. Upon information and belief, at all times herein mentioned, Defendant **EUGENE H. HASIWAR** was, and still is, a resident of the County of Bronx, State of New York.
3. Upon information and belief, at all times herein mentioned, Defendant **CHRISTOPHER J. MADDY** was, and still is, a resident of the State of Indiana.
4. Upon information and belief, at all times herein mentioned, Defendant **ERIC A. CLARK** was, and still is, a resident of the State of Indiana.
5. Upon information and belief, at all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** was, and still is, a resident of the State of New Jersey.
6. Upon information and belief, at all times herein mentioned, Defendant **UBER TECHNOLOGIES, INC.** was and still is a domestic corporation, foreign corporation or other



legal entity duly organized and existing under and by virtue of the laws of the State of California and doing business in the State of New York.

7. Upon information and belief, at all times herein mentioned, Defendant **UBER TECHNOLOGIES, INC.** maintained a principal place of business at 27-55 Jackson Avenue, Long Island City, State of New York.

8. At all times herein mentioned, Defendant **EUGENE H. HASIWAR** was the owner of a 1997 Toyota motor vehicle bearing New York State license plate number ELL7513.

9. At all times hereinafter mentioned, Defendant **EUGENE H. HASIWAR** operated the aforesaid motor vehicle bearing New York State license plate number ELL7513.

10. At all times hereinafter mentioned, Defendant **EUGENE H. HASIWAR** owned, operated, managed, maintained, controlled and repaired the aforesaid motor vehicle.

11. At all times herein mentioned, Defendant **EUGENE H. HASIWAR** breached a duty of care owed to the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** in that he failed to drive as a reasonably prudent person under the circumstances existing on July 27, 2019.

12. At all times herein mentioned, Defendant **ERIC A. CLARK** was the owner of a 2004 Chevrolet motor vehicle bearing Indiana State license plate number 132QAG.

13. At all times hereinafter mentioned, Defendant **CHRISTOPHER J. MADDY** operated the aforesaid motor vehicle bearing Indiana State license plate number 132QAG.

14. At all times herein mentioned, Defendant **CHRISTOPHER J. MADDY** operated the aforementioned motor vehicle with the knowledge, permission and consent of Defendant **ERIC A. CLARK**.

15. At all times herein mentioned, Defendant **ERIC A. CLARK** negligently entrusted the aforementioned motor vehicle to Defendant **CHRISTOPHER J. MADDY**.

16. At all times herein mentioned, Defendant **ERIC A. CLARK** knew or should have known that Defendant **CHRISTOPHER J. MADDY** was incompetent to operate said vehicle.

17. At all times hereinafter mentioned, Defendant **CHRISTOPHER J. MADDY** owned, operated, managed, maintained, controlled and repaired the aforesaid motor vehicle.

18. At all times hereinafter mentioned, Defendant **ERIC A. CLARK** owned, operated, managed, maintained, controlled and repaired the aforesaid motor vehicle.

19. At all times herein mentioned, Defendant **CHRISTOPHER J. MADDY** breached a duty of care owed to the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** in that he failed to drive as a reasonably prudent person under the circumstances existing on July 27, 2019.

20. Upon information and belief, Defendant **UBER TECHNOLOGIES, INC.** was and is a technology company offering vehicles for hire through its operating system, Uber Car Transportation.

21. Upon information and belief, Defendant **UBER TECHNOLOGIES, INC.** offered its services to residents of the State of New York and conducted business within the State of New York.

22. At all times herein mentioned, Defendant **UBER TECHNOLOGIES, INC.** employed drivers.

23. At all times herein mentioned, Defendant **UBER TECHNOLOGIES, INC.** employed Defendant, **JONAS G. ESTRELLA-REYNOSO**, as one of its drivers.

24. At all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** was the owner of a 2011 Honda motor vehicle bearing New Jersey State license plate number A42LJJ.

25. At all times hereinafter mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** operated the aforesaid motor vehicle bearing New Jersey State license plate number A42LJJ.

26. At all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** was the operator of the aforesaid motor vehicle bearing New Jersey State license plate number A42LJJ while in the course of her employ with Defendant **UBER TECHNOLOGIES, INC.**

27. At all times hereinafter mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** owned, operated, managed, maintained, controlled and repaired the aforesaid motor vehicle.

28. At all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** was an agent of Defendant **UBER TECHNOLOGIES, INC.**

29. At all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** was a servant of Defendant **UBER TECHNOLOGIES, INC.**

30. At all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** was a contractor of Defendant **UBER TECHNOLOGIES, INC.**

31. At all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO**, while in the course of his employ with Defendant **UBER TECHNOLOGIES, INC.** operated the aforementioned motor vehicle on behalf of, at the direction of, in furtherance of the business of and in the scope of his employment with Defendant **UBER TECHNOLOGIES, INC.**

32. At all times herein mentioned, Defendant **UBER TECHNOLOGIES, INC.** negligently entrusted the aforementioned motor vehicle to Defendant **JONAS G. ESTRELLA-REYNOSO**.

33. At all times herein mentioned, Defendant **UBER TECHNOLOGIES, INC.** knew or should have known that Defendant **JONAS G. ESTRELLA-REYNOSO** was incompetent to operate said vehicle.

34. At all times herein mentioned, Defendant **JONAS G. ESTRELLA-REYNOSO** breached a duty of care owed to the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** in that he failed to drive as a reasonably prudent person under the circumstances existing on July 27, 2019.

35. At all times hereinafter mentioned, Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** was a passenger in the motor vehicle owned and operated by Defendant **JONAS G. ESTRELLA-REYNOSO** bearing New Jersey State license plate number A42LJJ.

36. At all times hereinafter mentioned, the Saw Mill River Parkway North at or near its intersection with McLean Avenue overpass, City of Yonkers, County of Westchester, State of New York, was a public roadway and/or thoroughfare.

37. That on July 27, 2019, Defendant **EUGENE H. HASIWAR** was operating his motor vehicle at the aforesaid location.

38. That on July 27, 2019, Defendant **CHRISTOPHER J. MADDY** was operating the motor vehicle owned by Defendant **ERIC A. CLARK** at the aforesaid location.

39. That on July 27, 2019, Defendant **JONAS G. ESTRELLA-REYNOSO** was operating his motor vehicle at the aforesaid location.

40. That on July 27, 2019, Defendant **JONAS G. ESTRELLA-REYNOSO** was operating his motor vehicle at the aforesaid location with Plaintiff, **ALEJANDRA C. PEREZ VASQUEZ**, a passenger in said vehicle.

41. That on July 27, 2019, at the aforementioned location, the motor vehicle owned and operated by Defendant **EUGENE H. HASIWAR** came into contact with the motor vehicle owned by Defendant **ERIC A. CLARK** and operated by Defendant **CHRISTOPHER J. MADDY** and also came into contact with the motor vehicle owned and operated by Defendant **JONAS G. ESTRELLA-REYNOSO** and in which Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** was a passenger.

42. That as a result of the aforesaid contact, Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** was seriously injured.

43. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendant **EUGENE H. HASIWAR** without any fault or negligence on the part of the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** contributing thereto.

44. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendant **CHRISTOPHER J. MADDY** without any fault or negligence on the part of the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** contributing thereto.

45. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendant **ERIC A. CLARK** without any fault or negligence on the part of the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** contributing thereto.

46. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendant **JONAS G. ESTRELLA-REYNOSO** without any fault or negligence on the part of the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** contributing thereto.

47. That the aforesaid occurrence was caused wholly and solely by reason of the negligence of the Defendant **JONAS G. ESTRELLA-REYNOSO** without any fault or negligence on the part of the Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** contributing thereto.

48. The Defendant **UBER TECHNOLOGIES, INC.** was vicariously liable for the reckless, careless and negligent acts of its driver and employee, agent, servant and contractor.

49. That Defendant **EUGENE H. HASIWAR** was negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendant was otherwise negligent, careless and reckless in the motor vehicle.

50. That Defendant **CHRISTOPHER J. MADDY** was negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendant was otherwise negligent, careless and reckless in the motor vehicle.

51. That Defendant **ERIC A. CLARK** was negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendant was otherwise negligent, careless and reckless in the motor vehicle.

52. That Defendant **JONAS G. ESTRELLA-REYNOSO** was negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendant was otherwise negligent, careless and reckless in the motor vehicle.

53. That Defendant **JONAS G. ESTRELLA-REYNOSO** was negligent, careless and reckless in the ownership, operation, management, maintenance, supervision, use and control of the aforesaid vehicle and the Defendant was otherwise negligent, careless and reckless in the motor vehicle.

54. That by reason of the foregoing, Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** sustained severe and permanent personal injuries; and Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** was otherwise damaged.

55. That Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** sustained serious injuries as defined in Subdivision d of §5102 of the Insurance Law-Recodification.

56. That Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** sustained serious injuries and economic loss greater than basic economic loss as to satisfy the exceptions of §5104 (d) of the Insurance Law.

57. That this action falls within one or more of the exceptions as set forth in CPLR §1602.

58. That by reason of the foregoing, Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** has been damaged in an amount which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction herein.

**WHEREFORE**, Plaintiff **ALEJANDRA C. PEREZ VASQUEZ** prays for judgment against the Defendants **EUGENE H. HASIWAR, CHRISTOPHER J. MADDY, ERIC A. CLARK, JONAS G. ESTRELLA-REYNOSO** and **UBER TECHNOLOGIES, INC.** in amounts which exceed the jurisdictional limits of all lower courts which would otherwise have jurisdiction herein, together with the costs and disbursements of this action.

NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 05/02/2022

Dated: Garden City, New York  
May 2, 2022

Yours, etc.

DELL & DEAN, PLLC  
Attorneys for Plaintiff  
ALEJANDRA C. PEREZ VASQUEZ

By: 

JOSEPH G. DELL

1225 Franklin Avenue, Suite 450  
Garden City, New York 11530  
(516) 880-9700



NYSCEF DOC. NO. 1

RECEIVED NYSCEF: 05/02/2022

VERIFICATION

STATE OF New York  
COUNTY OF Nassau ss.:

Alejandra C. Perez Vasquez being duly sworn, deposes and says:

I am the plaintiff in the within action;

I have read the following Summons + Complaint and believe the same to be true to my knowledge; the same is true to my knowledge except as to those matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

Alejandra C. Perez Vasquez

Sworn to before me this 2nd day of May, 2022

Donna M. Parent  
Notary Public

DONNA M. PARENT  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01PA5008225  
Qualified in Suffolk County  
My Commission Expires 02-16-2023

Index No:

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**

ALEJANDRA C. PEREZ VASQUEZ,

*Plaintiff,*

*-against-*

EUGENE H. HASIWAR, CHRISTOPHER J. MADDY, ERIC A. CLARK, JONAS G.  
ESTRELLA-REYNOSO and UBER TECHNOLOGIES, INC.,

*Defendants.*

**SUMMONS AND VERIFIED COMPLAINT**

**DELL & DEAN, PLLC**  
*Attorneys for Plaintiff*  
1225 Franklin Avenue, Suite 450  
Garden City, New York 11530  
(516) 880-9700

Pursuant to 22 NYCRR 130-1.1-a, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, (1) the contentions contained in the annexed document are not frivolous and that (2) if the annexed document is an initiating pleading, (i) the matter was not obtained through illegal conduct, or that if it was, the attorney or other persons responsible for the illegal conduct are not participating in the matter or sharing in any fee earned therefrom and that (ii) if the matter involves potential claims for personal injury or wrongful death, the matter was not obtained in violation of 22 NYCRR 1200.41-A.

Dated: May 2, 2022

Signature.....  
Print : Joseph G. Dell

**PLEASE TAKE NOTICE**

**NOTICE OF Entry** That the within is a (certified) true copy of an  
Entered in the office of the clerk of the within-named Court on

**NOTICE OF SETTLEMENT** That an Order of which is a true copy will be presented for settlement to the  
Hon. , one of the judges of the  
within-named Court,  
at  
on 20 , at

M.

Dated:

**DELL & DEAN, PLLC**  
*Attorneys for Plaintiff*  
1225 Franklin Avenue, Suite 450  
Garden City, New York 11530  
(516) 880-9700